

Michael L. Mallow (SBN 188745)
mmallow@shb.com
Rachel A. Straus (SBN 268836)
rstraus@shb.com
SHOOK, HARDY & BACON L.L.P.
2049 Century Park East, Suite 3000
Los Angeles, CA 90067-3204
Tel: (424) 285-8330 | Fax: (424) 204-9093

Amir Nassihi (SBN 235936)
anassihi@shb.com
Nalani Crisologo (SBN 313402)
ncrisologo@shb.com
SHOOK, HARDY & BACON L.L.P.
One Montgomery, Suite 2600
San Francisco, CA 94104
Tel: (415) 544-1900 | Fax: (415) 391-0281

Attorneys for Defendant
TESLA INC.

[additional counsel listed in signature block]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ZACHERY WILLIAMS and MICHAEL MA,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

TESLA, INC. and DOES 1 through 10,
inclusive,

Defendants.

Case No. 4:20-cv-08208-HSG

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COMPLAINT AND CONTINUANCE OF
CASE MANAGEMENT CONFERENCE**

1 IT IS HEREBY STIPULATED by and between Plaintiffs Zachery Williams and Michael Ma
2 (“Plaintiffs”) and Defendant Tesla Inc. (“Tesla”) (collectively, the “Parties”), by and through their
3 respective counsel of record, that:

4 WHEREAS, on November 20, 2020, Plaintiffs filed their complaint (Dkt. 1);

5 WHEREAS, on November 25, 2020, Plaintiffs filed their Amended Complaint (Dkt. 7);

6 WHEREAS, per the parties’ January 18, 2021 stipulation, the current deadline for Tesla to
7 respond to the complaint is March 3, 2021 (Dkt 20);

8 WHEREAS, per the clerk’s December 10, 2020 notice, the Case Management Conference in
9 this case is set for March 16, 2021;

10 WHEREAS, the parties have engaged in substantive and productive discussions about
11 Plaintiffs’ claims and continue to engage in those discussions;

12 WHEREAS, the parties believe it would conserve judicial and party resources and promote
13 efficiency if the parties had additional time to continue their discussions before Tesla files its
14 response to the Amended Complaint and the parties appear for the Case Management Conference;

15 WHEREAS, the Parties stipulate and agree, subject to Court approval, that Tesla’s deadline
16 to respond to the Amended Complaint is continued from March 3, 2021 to March 31, 2021;

17 WHEREAS, the Parties further stipulate and agree, subject to Court approval, that if Tesla
18 files a pleading challenge, rather than answering the Amended Complaint, the deadline for Plaintiffs
19 to file an opposition to Tesla’s motion is April 28, 2021 and Tesla’s deadline to file its reply in
20 support of its motion is May 19, 2021;

21 THEREFORE, the Parties respectfully request, subject to Court approval, that:

22 (1) Tesla’s current deadline of March 3, 2021 to respond to the Amended Complaint be
23 continued to March 31, 2021;

24 (2) If Tesla files a pleading challenge, the deadline for Plaintiffs’ opposition is April 28,
25 2021 and the deadline for Tesla’s reply in support of its motion is May 19, 2021;

26 (3) The Case Management Conference currently scheduled for March 16, 2021 be continued
27 until April 6 or any time there after that the Court is available.

28 IT IS SO STIPULATED.

1 Dated: February 24, 2021

Respectfully submitted
McCUNE WRIGHT AREVALO, LLP

3 By: /s/ David C. Wright

4 Mark I. Richards
Steven A. Haskins
David C. Wright

6 Attorneys for Plaintiffs
ZACHERY WILLIAMS and MICHAEL MA

7 Dated: February 24, 2021

SHOOK HARDY & BACON L.L.P.

8 By: /s/ Amir Nassihi

9 Amir Nassihi
Michael L. Mallow
Rachel A. Straus
10 Nalani Crisologo

11 Attorneys for Defendant
12 TESLA, INC.

13
14 Pursuant to L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been
15 obtained from the other signatories.
16

17 By: /s/ Amir Nassihi
18 Amir Nassihi
19
20
21
22
23
24
25
26
27
28

ORDER

Having considered the parties' stipulation, and good cause showing, the Court hereby orders the following:

- (1) Tesla's response to the Amended Complaint is due on March 31, 2021;
- (2) If Tesla files a pleading challenge, the deadline for Plaintiffs' opposition is April 28, 2021 and the deadline for Tesla's reply in support of its motion is May 19, 2021;
- (3) The Case Management Conference currently scheduled for March 16, 2021 is continued to April 6, 2021.

IT IS SO ORDERED.

Dated: 2/25/2021


HONORABLE HAYWOOD S. GILLIAM JR.
U.S. DISTRICT COURT JUDGE